UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

VISION INDUSTRIES GROUP, INC.,

                    Plaintiff,

     v.

ACU PLASMOLD, INC., ABC COMPANIES 1-10
and XYZ CORPORATIONS 1-10,

                 Defendants.

Case No. 2:18-cv-6296 (ES) (CLW)

SUPPLEMENTAL DECLARATION OF MARK LANTERMAN

I, Mark Lanterman, being first duly sworn on my oath, do depose and state that:

1.   My name is Mark Lanterman. I am the Chief Technology Officer of Computer Forensic Services ("CFS") located in Minneapolis, Minnesota. I offer this supplemental declaration in response to this Court's Order Dkt. 256 requesting clarification of my prior work.

I.   Expert background & qualifications

2.   Our firm specializes in the analysis of digital evidence in civil and criminal litigation. I have over 35 years of experience in computer forensics and cybersecurity.

3.   Prior to joining CFS, I was a sworn investigator for the United States Secret Service Electronic Crimes Task Force and acted as its senior computer forensic analyst.

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4.   I am certified by the United States Department of Homeland Security as a "Seized Computer Evidence Recovery Specialist," as well as certified in computer forensics by the National White-Collar Crime Center. Both federal and state courts have appointed me as a neutral computer forensic analyst or special master.

5.   I graduated from Upsala College with both a Bachelor of Science and a Master's degree in computer science. I completed my post graduate work in cybersecurity at Harvard University.

6.   I have previously served as adjunct faculty of computer science for the University of Minnesota Technological Leadership Institute's Master of Science and

7.   Security Technologies program (MSST). I am a faculty member at the University of St. Thomas School of Law in Minnesota, and for the National Judicial College in Reno, Nevada. I have instructed members of the federal judiciary through the Federal Judicial Center in Washington, D.C.

8.   I am a member of Working Groups 1 and 11 for the Sedona Conference, which is an institute dedicated to the advanced study of law. I serve on the Sedona Conference's Steering Committee on Artificial Intelligence and the Law.

9.   I am currently appointed to the Arizona Supreme Court's Steering Committee on Artificial Intelligence and the Courts.

10.   I have previously provided training or delivered keynote addresses for the United States Supreme Court; the Eleventh Circuit Federal Judicial Conference; the Eighth Circuit Federal Judicial Conference; the Southern District of Georgia; the Western District of Tennessee; and several state judicial conferences. I delivered the

keynote address at the Chief Justices' Conference in Newport, Rhode Island and at Georgetown Law School's advanced e-discovery conference.

11.   I was appointed by the Minnesota Supreme Court to serve the maximum 6-year term as a member of Minnesota's Lawyers Professional Responsibility Board ("LPRB").

12.   I am a co-author of the Minnesota State Bar's e-Discovery Deskbook, and I also write monthly articles for Minnesota Bench & Bar magazine.

13.   CFS holds a corporate private detective license issued by the State of Minnesota Board of Private Detective and Protective Agent Services (License No. 2341).

14.   CFS was awarded a Multiple Award Schedule contract (contract #47QTCA22D004L) for the 54151HACS (highly adaptive cybersecurity services) SIN by the General Services Administration (GSA). GSA awarded CFS the contract after a rigorous inspection and technical competence evaluation of knowledge, abilities, competency, policies, and procedures.

15.   CFS is the exclusive, contracted computer forensic service provider for the Hennepin County Sheriff's Office (the county that encompasses Minneapolis); as well as the Metropolitan Airports Commission, also known as the Minneapolis/Saint Paul International Airport. I am a primary point-of-contact for servicing these contracts on behalf of CFS.

II.   Analysis of John Quach's Laptop

16.   On November 3, 2021, I submitted a declaration discussing my review of electronically stored information obtained from John Quach's laptop. Dkt. 146-2.

17.   I have reviewed my previous declaration, and it is accurate.

18.   The Court's specific questions are addressed below.

19.   Pursuant to Paragraphs 18 and 19 of my prior declaration, when I reviewed the Quach laptop, I found at least ten (10) QuickBooks company files (".QBW" files) and eight (8) QuickBooks backup files (".QBB" files). I only reviewed three (3) of the ".QBW" files. In other words, I reviewed less than a 1/6 of the QuickBooks files I found.

20.   I have also reviewed Vision's statement to the Court that "BitRaser was installed on Mr. Quach's computer."

21.   Consistent with that statement, when I reviewed the Quach laptop, I found a program called "BitRaser" that was installed and executed on September 21, 2021.

22.   BitRaser is a program for performing permanent data erasure from computers.

23.   I informed counsel for all parties of my findings during telephone calls and emails.

24.   With regard to BitRaser, I provided the parties with several reports describing the contents of the Quach computer. One of the reports was titled "ATTORNEYS EYES ONLY - 1.1 Lenovo T470 - Installed Programs – Report." A truncated copy of that report is attached hereto as Exhibit 1.

25.   As the Installed Programs Report shows, an application named "BitRaser

File Eraser" was installed, and analysis determined it was executed, on the Quach

laptop on September 21, 2021.

I declare under penalty of perjury under the law of the United States that the foregoing
is true and correct.

Executed on: July 11, 2024

_____
            Mark Lanterman

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Exhibit 1

Created Date	Key Last Updated Date/Time - UTC-08:00	Application Name
09/21/2021	09/21/2021 11:40:59 PM	BitRaser File Eraser
09/21/2021	09/21/2021 09:08:43 PM	Google Chrome
09/20/2021	09/20/2021 12:34:30 PM	McAfee Safe Connect
09/17/2021	09/17/2021 08:35:19 PM	Microsoft Edge
09/16/2021	09/16/2021 11:23:10 PM	Adobe Acrobat Reader DC
09/13/2021	09/17/2021 10:11:31 AM	Adobe Refresh Manager
09/03/2021	09/03/2021 08:59:52 AM	Microsoft Update Health Tools
08/26/2021	08/26/2021 01:52:19 PM	Lenovo Vantage Service
08/12/2021	08/12/2021 06:11:33 PM	HP Unified IO
08/12/2021	08/12/2021 06:16:44 PM	hppLaserJetService
08/12/2021	08/12/2021 06:16:35 PM	hppM277LaserJetService
08/12/2021	08/12/2021 06:16:26 PM	HPCLJProM277
08/12/2021	08/12/2021 06:11:32 PM	HP Unified IO
06/29/2021	06/29/2021 05:14:04 PM	ANT Drivers Installer x64
06/29/2021	06/29/2021 05:13:59 PM	Elevated Installer
06/29/2021	06/29/2021 05:13:57 PM	Garmin Express
05/18/2021	05/18/2021 12:52:23 PM	Corel Update Manager
03/15/2021	03/15/2021 10:00:32 PM	Microsoft Visual C++ 2019 X64 Additional Runtime - 14.28.29910
03/15/2021	03/15/2021 10:00:13 PM	Microsoft Visual C++ 2019 X64 Minimum Runtime - 14.28.29910
03/11/2021	03/11/2021 04:24:22 PM	Telegram Desktop version 2.6.1
03/10/2021	03/10/2021 10:51:48 AM	Private Internet Access WinTUN Driver
02/03/2021	02/03/2021 10:55:48 PM	BPA+
02/03/2021	02/03/2021 10:55:46 PM	BPA+
01/23/2021	01/23/2021 09:55:28 PM	Malwarebytes Privacy version 2.4.0.497
01/23/2021	01/23/2021 09:55:32 PM	Malwarebytes Privacy VPN Tunnel Driver
01/06/2021	01/06/2021 03:46:17 PM	Dolby Audio X2 Windows API SDK
12/30/2020	12/30/2020 11:04:43 PM	WinZip 24.0
12/25/2020	12/25/2020 08:31:14 PM	Malwarebytes version 4.3.0.98
12/17/2020	12/17/2020 03:55:33 PM	QuickBooks
12/17/2020	12/17/2020 03:38:18 PM	GlanceGuest version 4.8.1.7
12/09/2020	12/09/2020 09:33:42 AM	iTunes
12/09/2020	12/09/2020 09:31:37 AM	Bonjour
12/09/2020	12/09/2020 09:31:53 AM	Apple Mobile Device Support
12/09/2020	12/09/2020 09:32:00 AM	Apple Software Update
11/27/2020	11/27/2020 09:09:35 PM	RealNetworks - Microsoft Visual C++ 2008 Runtime
11/27/2020	11/27/2020 09:09:38 PM	vc2012_redist
11/27/2020	11/27/2020 09:09:36 PM	RealNetworks - Microsoft Visual C++ 2010 Runtime

Created Date	Key Last Updated Date/Time - UTC-08:00	Application Name
11/27/2020	11/27/2020 09:09:15 PM	vs2015_redist x86
11/27/2020	11/27/2020 09:10:21 PM	UpdateService
07/05/2020	09/30/2020 02:22:01 PM	Topaz Sharpen AI
06/30/2020	09/30/2020 02:22:02 PM	IPM_PSP_COM64
06/30/2020	09/30/2020 02:22:03 PM	PSPPro64
06/30/2020	09/30/2020 02:23:01 PM	PSPPContent
06/30/2020	09/30/2020 02:23:02 PM	PSPPHelp
06/30/2020	09/30/2020 02:23:02 PM	ICA
06/30/2020	09/30/2020 02:23:03 PM	Setup
06/29/2020	09/30/2020 02:23:00 PM	Focus Magic 4.03
06/29/2020	09/30/2020 02:23:04 PM	Blurity version 1.5.177
06/29/2020	09/30/2020 02:22:01 PM	Microsoft Visual C++ 2010 x64 Redistributable - 10.0.40219
06/29/2020	09/30/2020 02:22:02 PM	Microsoft Visual C++ 2012 x64 Additional Runtime - 11.0.61030
06/29/2020	09/30/2020 02:22:02 PM	Microsoft Visual C++ 2013 x64 Additional Runtime - 12.0.40660
06/29/2020	09/30/2020 02:22:03 PM	Microsoft Visual C++ 2013 x64 Minimum Runtime - 12.0.40660
06/29/2020	09/30/2020 02:22:03 PM	Microsoft Visual C++ 2012 x64 Minimum Runtime - 11.0.61030
06/29/2020	09/30/2020 02:23:01 PM	Microsoft Visual C++ 2019 X86 Minimum Runtime - 14.23.27820
06/29/2020	09/30/2020 02:23:02 PM	Microsoft Visual C++ 2013 x86 Additional Runtime - 12.0.40660
06/29/2020	09/30/2020 02:23:02 PM	Microsoft Visual C++ 2019 X86 Additional Runtime - 14.23.27820
06/29/2020	09/30/2020 02:23:03 PM	Microsoft Visual C++ 2012 x86 Additional Runtime - 11.0.61030
06/29/2020	09/30/2020 02:23:03 PM	Microsoft Visual C++ 2012 x86 Minimum Runtime - 11.0.61030
06/29/2020	09/30/2020 02:23:04 PM	Microsoft Visual C++ 2013 x86 Minimum Runtime - 12.0.40660
06/29/2020	09/30/2020 02:23:04 PM	Microsoft Visual C++ 2010 x86 Redistributable - 10.0.40219
06/28/2020	09/30/2020 02:23:01 PM	SmartDeblur 2.3 HOME
03/20/2020	09/30/2020 02:23:01 PM	Thunderbolt™ Software
01/08/2020	09/30/2020 02:23:01 PM	DWG DXF to PDF Converter version 1.1
12/29/2019	09/30/2020 02:13:42 PM	Movavi PDF Editor 3
12/23/2019	09/30/2020 02:22:03 PM	QuickBooks Runtime Redistributable
12/23/2019	09/30/2020 02:23:03 PM	ABS PDF Install
12/23/2019	12/17/2020 03:51:05 PM	Microsoft Visual C++ 2008 Redistributable - x86 9.0.30729.17
12/19/2019	09/30/2020 02:23:01 PM	Ashampoo HDD Control 3
12/19/2019	09/30/2020 02:23:02 PM	Ashampoo Photo Optimizer 7
12/17/2019	09/30/2020 02:22:01 PM	ActMask PDF Virtual Printer SDK
12/17/2019	09/30/2020 02:23:01 PM	Ashampoo PDF Pro 2
12/17/2019	09/30/2020 02:23:02 PM	Ashampoo Uninstaller 2017
12/17/2019	09/30/2020 02:23:01 PM	Ashampoo WinOptimizer 2019
12/17/2019	09/30/2020 02:23:04 PM	Brother MFL-Pro Suite MFC-L2685DW

Created Date	Key Last Updated Date/Time - UTC-08:00	Application Name
12/12/2019	09/30/2020 02:22:01 PM	Intel® PROSet/Wireless WiFi Software
12/12/2019	09/30/2020 02:22:03 PM	Intel(R) PRO/Wireless Driver
12/11/2019	09/30/2020 02:22:01 PM	Update for Windows 10 for x64-based Systems (KB4023057)
12/11/2019	09/30/2020 02:22:02 PM	Update for Windows 10 for x64-based Systems (KB4480730)
12/09/2019	09/30/2020 02:22:02 PM	LibreOffice 6.3.3.2
07/05/2019	09/30/2020 02:22:01 PM	Intel(R) Management Engine Components
07/05/2019	09/30/2020 02:22:01 PM	Microsoft VC++ redistributables repacked.
07/05/2019	09/30/2020 02:22:01 PM	Intel(R) Management Engine Components
07/05/2019	09/30/2020 02:22:02 PM	Lenovo Active Protection System
07/05/2019	09/30/2020 02:22:02 PM	Intel(R) Management Engine Components
07/05/2019	09/30/2020 02:22:02 PM	Intel(R) Chipset Device Software
07/05/2019	09/30/2020 02:22:03 PM	Intel(R) Management Engine Driver
07/05/2019	09/30/2020 02:22:03 PM	Intel(R) Trusted Connect Service Client x64
07/05/2019	09/30/2020 02:22:03 PM	Intel(R) ME UninstallLegacy
07/05/2019	09/30/2020 02:23:03 PM	Intel(R) Trusted Connect Service Client x86
07/05/2019	09/30/2020 02:23:04 PM	Microsoft VC++ redistributables repacked.
	09/01/2021 09:28:30 AM	Opera GX Stable 78.0.4093.186
	09/17/2021 08:51:02 PM	Zoom
	09/30/2020 02:13:42 PM	Topaz Adjust AI
	09/30/2020 02:13:42 PM	Movavi Photo Editor 6
	12/08/2020 04:48:52 PM	7-Zip 19.00 (x64)
	09/30/2020 02:22:01 PM	Bitdefender Internet Security
	08/26/2021 09:12:04 PM	Bitdefender Agent
	06/30/2021 06:20:14 PM	Bitdefender VPN
	09/30/2020 02:22:01 PM	Windows Driver Package - Lenovo Monitor (08/16/2018 6.09.01.0)
	06/29/2021 05:14:04 PM	Windows Driver Package - Dynastream Innovations, Inc. ANT LibUSB Drivers (04/11/2012 1.2.40.20
	09/30/2020 02:22:01 PM	Photo Pos Pro 3
	06/29/2021 05:14:03 PM	Windows Driver Package - Silicon Labs Software (DSI_SiUSBXp_3_1) USB (02/06/2007 3.1)
	09/20/2021 03:49:32 PM	McAfee Security Scan Plus
	11/27/2020 09:11:12 PM	VLC media player
	09/30/2020 02:22:01 PM	Intel(R) Management Engine Components
	03/10/2021 10:51:39 AM	Private Internet Access
	10/08/2020 10:51:18 PM	Adobe Creative Cloud
	02/28/2021 02:52:02 AM	Adobe Genuine Service
	09/30/2020 02:23:01 PM	Adobe Photoshop 2020
	08/17/2021 07:20:25 PM	Microsoft Edge Update
	09/30/2020 02:23:01 PM	Movavi Photo Focus

Created Date	Key Last Updated Date/Time - UTC-08:00	Application Name
	11/27/2020 09:09:54 PM	RealPlayer
	01/26/2021 04:51:27 PM	VLC media player
	04/06/2021 08:50:07 PM	WeChat
	09/30/2020 02:23:01 PM	Corel PaintShop Pro 2020
	09/20/2021 12:34:51 PM	McAfee Safe Connect
	09/30/2020 02:23:02 PM	Intel(R) Chipset Device Software
	09/30/2020 02:23:02 PM	Intel® PROSet/Wireless Software
	09/30/2020 02:23:02 PM	Intel(R) Trusted Connect Services Client
	08/12/2021 06:16:24 PM	HP Color LaserJet Pro MFP M277
	06/29/2021 05:14:04 PM	Garmin Express
	12/17/2020 03:55:27 PM	QuickBooks Pro 2021
	09/11/2021 02:39:22 PM	Microsoft OneDrive
	09/30/2020 02:23:01 PM	Microsoft Visual C++ 2013 Redistributable (x64) - 12.0.30501
	09/30/2020 02:23:01 PM	Microsoft Visual C++ 2012 Redistributable (x86) - 11.0.61030
	06/29/2021 05:13:40 PM	Microsoft Visual C++ 2015-2019 Redistributable (x86) - 14.23.27820
	03/15/2021 10:00:34 PM	Microsoft Visual C++ 2015-2019 Redistributable (x64) - 14.28.29910
	09/30/2020 02:23:02 PM	Microsoft Visual C++ 2013 Redistributable (x86) - 12.0.40660
	09/30/2020 02:23:04 PM	Microsoft Visual C++ 2012 Redistributable (x64) - 11.0.61030
	09/30/2020 02:23:04 PM	Microsoft Visual C++ 2013 Redistributable (x64) - 12.0.40660
	09/30/2020 02:23:04 PM	Microsoft Visual C++ 2013 Redistributable (x86) - 12.0.30501